

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)	
)	
v.)	
)	Criminal Action No.
THOMAS VIGLIATURA,)	05-CR-40033-FDS
MATTHEW MCLAUGHLIN,)	
BRIAN BENEDICT, and)	
HERIBERTO ARROYO,)	
Defendants.)	
)	

UNITED STATES' BILL OF PARTICULARS
FOR FORFEITURE OF ASSETS

The United States of America, by and through its attorney, Michael J. Sullivan, United States Attorney for the District of Massachusetts, hereby files the following Bill of Particulars for Forfeiture of Assets.

On or about July 27, 2005, a federal grand jury in the District of Massachusetts returned a six-count Indictment charging Defendant Thomas Vigliatura ("Defendant" or "Vigliatura"), and others, with Conspiracy to Distribute and to Possess with Intent to Distribute GHB and GBL, in violation of 21 U.S.C. §846 (Count One); Conspiracy to Possess Cocaine and 3,4 methylenedioxymethamphetamine/MDMA (Ecstasy), in violation of 21, U.S.C. §846 (Count Two); Possession with Intent to Distribute and Distribution of GBL and GHB, in violation of 21 U.S.C. §841(a)(1) (Counts Three through Six).

The Indictment also contained a forfeiture allegation, which, as a result of the offenses alleged in Counts One and Three through Six of the Indictment, and pursuant to 21 U.S.C. §853, sought the

forfeiture of any and all property constituting, or derived from, any proceeds the defendant obtained, directly or indirectly, as a result of such offenses; and any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offenses. Such property includes, but is not limited to, the following:

- (a) \$50,000 in United States currency, in that sum in aggregate represents the amount the defendants received as a result of the violation;
- (b) all right, title, or interest in the business known as "T VIGS SPORTS SUPPLEMENTS," having a corporate place of business at 98 W. Boylston Street, Worcester, Massachusetts; and
- (c) all right, title, or interest in the real property located at 118 Santoro Road, Worcester, Massachusetts having a deed recorded at Book 22357, Page 248 at the Worcester County Registry of Deeds.

The United States is filing this Bill of Particulars to correct the deed information for the real property located at 118 Santoro Road, Worcester, Massachusetts due to a clerical error in the Criminal Forfeiture Allegation of the Indictment filed with this Court on July 27, 2005. The deed information was listed in the Indictment as Book 32867, Page 308, Document No. 26988, which is the Mortgage Electronic Registration Systems, Inc./First Magnus Financial Corporation mortgage information. The correct deed information is Book 22357, Page 248.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ JENNIFER H. ZACKS
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Dated: December 9, 2005

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing
upon the following:

Peter L. Ettenberg, Esquire
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/s/ JENNIFER H. ZACKS
Jennifer H. Zacks
Assistant U.S. Attorney

Dated: December 9, 2005